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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Pamela J. Roche,  Plaintiff,  v.  Barclays Bank Delaware and Experian Information Solutions, Inc.,  Defendants.	Case No.: 2:18-cv-01588-JAD-CWH  <b>Stipulation for an extension of time for Plaintiff to Respond to Defendant's Motion to Dismiss and Motion to Stay Discovery [ECF Nos. 16, 17]</b>  <b>(First Request)</b>
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Pamela J. Roche ("Plaintiff") and Experian Information Solutions, Inc. ("Defendant"), by and through their respective counsel, hereby submit this stipulation for an extension of time—until **January 11, 2019**—for Plaintiff to respond to Defendant's Motion to Dismiss Plaintiff's Amended Complaint and Motion to Stay Discovery, both filed on December 24, 2018, ECF Nos. 16, 17.

Plaintiff's Responses are currently due on January 7, 2019.

Plaintiff filed her Amended Complaint on December 10, 2018. ECF No. 13. Defendant filed its motions on December 24, 2018, and given the timing of being served with the motions, during the holidays, Plaintiff's counsel requests, and Defendant does not oppose, a one week extension to file and serve responses to the pending motions. The Parties in good faith stipulate to allow additional time for Plaintiff to respond to the motions. This is the first request for an extension of this deadline.

The Parties therefore stipulate that Plaintiff's responses to Defendant's Motion to Dismiss and Motion to Stay Discovery, ECF Nos. 16, 17, shall be due on or before **January 11, 2019**.

DATED this 4th day of January 2019.

**KAZEROUNI LAW GROUP, APC**

By: /s/ Michael Kind  
Michael Kind, Esq.  
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**NAYLOR & BRASTER**

By: /s/ Jennifer L Braster  
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IT IS SO ORDERED:

  
UNITED STATES MAGISTRATE JUDGE

DATED: January 7, 2019

# CERTIFICATE OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on January 4, 2019, the foregoing Stipulation was served via CM/ECF to all parties appearing in this case.

**KAZEROUNI LAW GROUP, APC**

By: /s/ Michael Kind

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